

Georgia Department of Natural Resources

Environmental Protection Division

Reply To:
Response and Remediation Program
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Judson H. Turner, Director
Land Protection Branch
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April 29, 2014

VIA EMAIL & REGULAR MAIL

Atlanta Gas Light Company
c/o Mr. Greg Corbett, Director of Environment & Sustainability
Ten Peachtree Place
Atlanta, Georgia 30309

Re: December 2013 VRP Compliance Status Report
Former Rome Coal Tar Pit Site, HSI Site No. 10109
Rome, Floyd County, Georgia

Dear Mr. Corbett:

The Georgia Environmental Protection Division (EPD) has completed its review of your Voluntary Remediation Program Compliance Status Report (VRP CSR) dated December 6, 2013, which was provided in accordance with the requirements of the Georgia Voluntary Remediation Act (O.C.G.A. 12-8-107-108). Based on EPD's review of this document and associated file information, EPD cannot concur that the VRP CSR is complete. Therefore, in order to complete the VRP CSR requirements in accordance with the Act, please address the following comments:

- 1) According to the VRP CSR, the site has relied solely on the results of the Johnson and Ettinger Model (JEM) application in drawing conclusions regarding the vapor intrusion (VI) pathway for the nearby non-residential structures. Based on the available file information for the subject site, previous comments associated with the subject site have required additional supporting documentation, beyond that of the JEM, to justify that the vapor intrusion pathway for the nearby commercial businesses (Parcels J14D 045-J14D 50) would not be at risk of exposure from the contaminants from the site. The U.S. EPA and EPD both recommend that VI evaluations should be based on multiple lines of evidence with the results weighed together to achieve a concordance based on all the available information. Therefore, based on the recommendations from EPD's Risk Assessment Unit, EPD continues to request that additional documentation in support of the VI pathway evaluation be provided, including but not limited to an evaluation of the VI pathway through the use of U.S. EPA's risk-based Vapor Intrusion Screening Levels (VISLs) and sub-slab soil gas data in lieu of bulk soil data and/or indoor air sampling, as it is EPD's policy to not utilize bulk soil data in VI risk assessments (GAEPD, <http://gaepd.org/Documents/vaporintrusion.html>). Please revise the site-specific subsurface soil risk based cleanup goals (RBCGs) protective of the indoor air VI pathway, if necessary, based on the results of the additional supporting documentation.
- 2) The following non-residential Type 4 groundwater risk reduction standards proposed for benzene and naphthalene (23.9 mg/L)/(23.3 mg/L) were obtained from the J&E model. EPD does not believe that these values are acceptable Type 4 RRS values for groundwater, as they are typically calculated using RAGS2 equations (1, 2, 6 or 7) and leachability models. However, EPD will consider this an acceptable methodology, with the incorporation of any revision to the resulting values based on the above Comment (1), for the determination of a non-residential site specific

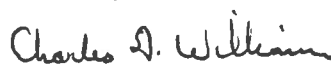
Type 5 RRS for groundwater contingent upon the long term implementation and maintenance of institutional controls at the site.

- 3) EPD requests that a table be included in the VRP CSR to document the established delineation criteria in accordance with Section 12-8-108(1) for each of the contaminants of concern (COCs).
- 4) As part of the EC Reporting and Annual Certification requirements, please include property use and EC compliance certifications for all surrounding properties that have been incorporated into risk based exposure determinations associated with the VRP CSR. In particular, the adjacent non-residential/commercial tax parcels J14D 043-J14D 50, located along the south side of the West 1st Street ROW, should include an additional reporting/certification requirement in support of the vapor intrusion (VI) pathway analysis to document that the conditions of these property and associated structure parameters have not been modified from those used during the VI evaluation.
- 5) Please include the Site Continued Action Monitoring Plan/Operations, Monitoring, and Maintenance Plan as part of the CSR Addendum submittal

Even though EPD has not formally approved the above referenced VRP CSR, EPD concurs with the proposed corrective action of implementing a long term monitoring and site management program through the use of an Operation, Maintenance & Monitoring Plan, along with the institutional control of an Environmental Covenant (EC) for the site related tax parcels.

The above listed comments may be addressed through the submittal of a CSR Addendum, to be received by EPD by no later July 17, 2014. Please ensure that the CSR Addendum includes updated copies of the parcel specific ECs, which have been designed to restrict future property land uses as non-residential, detail any future monitoring and reporting requirements, and restrict groundwater usage on all tax parcels containing residual source materials and/or overlying the groundwater plume. Should you have any question or concerns, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Ira Levy, Battey Downtown LLC
John Bennett, City Manager, City of Rome
Christie Battenhouse, Burns & McDonnell
Daphne Jones, PSC

File: HSI #10109, Former Rome Coal Tar Pit